

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO, EASTERN DIVISION**

**KING LINCOLN BRONZEVILLE  
NEIGHBORHOOD ASSOCIATION, ET AL.,**

**PLAINTIFFS,**

**VS.**

**JENNIFER BRUNNER, ET AL.,**

**DEFENDANTS.**

**CASE NO. 2:06-CV-745**

**JUDGE MARBLEY**

**MAGISTRATE JUDGE KEMP**

**PLAINTIFFS' MOTION TO EXTEND FURTHER TIME TO RESPOND TO  
DEFENDANT'S OPPOSITION TO RELIEF FROM STAY**

Plaintiffs move to further extend the time, to September 16, 2008, for them to respond to defendant's opposition to plaintiffs' motion for relief from the stay of this matter. Counsel have conferred and defendant's counsel has consented to this extension request.

Respectfully submitted,

/s/ Clifford O. Arnebeck, Jr.  
Clifford O. Arnebeck Jr. (0033391)  
Trial Attorney  
[arnebeck@aol.com](mailto:arnebeck@aol.com)  
Robert J. Fittrakis (0076796)  
[truth@freepress.org](mailto:truth@freepress.org)  
1000 East Main Street, Suite 102  
Columbus, Ohio 43215  
614-224-8771

Henry W. Eckhart (0020202)  
[henryeckhart@aol.com](mailto:henryeckhart@aol.com)  
50 West Broad Street, Suite 2117  
Columbus, Ohio 43215  
614-461-0984  
Counsel for Plaintiffs

## MEMORANDUM IN SUPPORT OF MOTION

Plaintiffs request an extension to September 16, 2008, to reply to defendant Secretary of State's opposition to lifting of the stay of this case at this time.

Plaintiffs' counsel are consulting with their expert witness, Stephen Spoonamore, for a declaration supporting the plaintiffs' proposed discovery plan for the critical period preceding the 2008 election. Due to illness, heavy work load and delays in obtaining technical information required for his analysis, more time is required to complete this declaration and discovery plan.

Wherefore, plaintiffs submit that their unopposed request for additional time for their reply is in the interest of justice and should be granted.

Respectfully submitted,

/s/Clifford O. Arnebeck, Jr.  
Clifford O. Arnebeck Jr. (0033391)  
Trial Attorney  
[arnebeck@aol.com](mailto:arnebeck@aol.com)  
Robert J. Fitakis (0076796)  
[truth@freepress.org](mailto:truth@freepress.org)  
1000 East Main Street, Suite 102  
Columbus, Ohio 43215  
614-224-8771

Henry W. Eckhart (0020202)  
[henryeckhart@aol.com](mailto:henryeckhart@aol.com)  
50 West Broad Street, Suite 2117  
Columbus, Ohio 43215  
614-461-0984  
Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

This is to certify a copy of the foregoing was served upon counsel of record by means of the Court's electronic filing system on this 10th day of September 2008.

/s/ Clifford O. Arnebeck, Jr.